

To the Commission:

In the matter of RM-10787, I would like to express my agreement that the Element 1, 5 words-per-minute telegraphy examination be removed as soon as possible. As a requirement, it is an anachronism. CW radio-telegraphy's purported advantages over other communication modes (reliability, bandwidth and cost) have been rapidly eroded through the advance of technology. High quality digital technology implementations of transceivers has made SSB and other voice modes much more reliable and modern digital transmission modes have greater throughput, reliability and less bandwidth than CW radio-telegraphy. As for cost, today a used laptop can be purchased and interfaced to an SSB transceiver to run digital modes for less than the price of a premium iambic paddle and keyer.

The other reason often given for a telegraphy requirement is to filter out "unsuitable" applicants from the pool of licensed operators. As the Commission well knows from all the complaints it receives about interference and obscenity on the HF bands, this is just not the case. In fact, by presenting applicants with an irrelevant examination requirement, the Commission may in fact be driving off the very applicants that the Amateur Radio Service needs the most - the technologically savvy young people who will experiment with modern RF technologies and provide enabling technologies to American businesses.

The lack of a telegraphy examination will not prevent those who want to use CW radiotelegraphy for communications from using it, any more than the lack of a typing test prevents digital mode aficionados from using PSK31, PACTOR, etc. Therefore, since it does no harm to the existing licensed amateur operators, since it has the possibility of reinvigorating the American RF technology base, since it brings the United States into line with accepted international practice and since it relieves an unnecessary regulatory burden, I would urge the Commission to amend the rules as requested in RM-10787.

Thank you for your attention,

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